

*KIMBERLY D. POLLARD and J.S.  
(MINOR CHILD),*

*Plaintiffs,*

v.

Case No. 2:16-cv-000238-J

*CHURCH OF GOD IN CHRIST,  
INC.; CHURCH OF GOD IN  
CHRIST, BOARD OF BISHOPS; and  
BISHOP JAMES L'KEITH JONES*

*Defendants.*

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**PLAINTIFF'S REPORT OF RULE 26(f) CONFERENCE AND DISCOVERY PLAN**

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Pursuant to the Court's Scheduling Order on January 5, 2017, and Rule 26(f) of the Federal Rules of Civil Procedure, the parties conducted a Rule 26(f) conference by telephone on January 24, 2017.

***A. Parties***

In attendance at the telephonic conference were: Jerry G. Matthews for Kimberly D. Pollard, et al; Ronald McLaurin for Kimberly D. Pollard et al; and Justin Jeter for Church of God In Christ, Inc. et al.

***B. Discussions***

The parties conferred regarding the topics set forth in Rule 26(f) and report as follows:

(1) Ronald McLaurin asked Justin Jeter if Mr. Jeter could get Church of God In Christ, Inc. to send him the formal complaint, including all documents and exhibits that had been submitted to them. Mr. Jeter agreed.

(2) Both sides agreed to deadlines in scheduling order.

(3) Both sides agreed to limited need for expert witnesses.

(4) Mr. McLaurin informed Mr. Jeter that plaintiffs were willing to discuss settlement options in this case.

(5) The parties agreed that all documents would be effective if served on parties via email.

(6) The parties both submitted their initial disclosures within 14 days after the Rule 26(f) conference.

***C. Discussions Since Rule 26(f) Telephone Conference***

(1) The parties discussed the scheduling of depositions. Mr. Jeter requested that Ms. Pollard be deposed during the second or third week of June. The Plaintiffs have agreed to make Ms. Pollard available to be deposed anytime the defendants' request in Lubbock, Texas during the month of June. Plaintiffs have requested that Mr. Jeter make Bishop Charles E. Blake available for deposition. Plaintiffs would like to depose Bishop Blake in June. Mr. Jeter has not responded to that request.

(2) Plaintiffs have reached out to Mr. Jeter to initiate settlement discussions. Mr. Jeter told plaintiffs that he would get back to them after he spoke to the Church of God In Christ, Inc. to get authorization to discuss settlement. As of today's date, Mr. Jeter has not gotten back to the Plaintiffs.

(3) Plaintiffs reached out to Mr. Jeter to draft a Joint Report of Rule 26(f) Conference and Discovery Plan on Wednesday April 19, 2017, with no response. On Thursday April 20, 2017, the Plaintiffs again reached out to Mr. Jeter in an effort to file a Joint Report of Rule 26(f) Conference and Discovery Plan; Mr. Jeter informed Plaintiffs that he would get back with them on Friday April 21, 2017, to attempt to file a joint report. Plaintiffs have not heard back from Mr. Jeter and is filing a Plaintiffs Report of Rule 26(f) Conference and Discovery Plan instead of a Joint Report.

Dated: April 24, 2017

Respectfully Submitted,

By: /s/ Jerry G. Matthews  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this filing was sent on April 24, 2017 via the Court's electronic notification system and/or email to the following counsel of record:

Justin Jeter

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By: /s/ Jerry G. Matthews

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